



KREINDLER & KREINDLER LLP | 485 Lexington Avenue | New York, NY 10017-2629

office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

June 27, 2025

VIA ECF

The Honorable George B. Daniels
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels, Dear Judge Netburn:

I write to advise the Court of Plaintiffs' receipt and filing of the last outstanding item from the May 9, 2025 production of the United Kingdom's Metropolitan Police Service (the "MPS 2025 Production"), pursuant to this Court's June 9, 2021 Request to the United Kingdom for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters ("Hague Convention Request") (ECF 6384-1, 6858).

The principal handover of the MPS 2025 Production was completed on May 9, 2025, and filed the same day. *See* ECF 10948-1. However, one item in the accompanying "Schedule of Relevant Material 2025," listed at URN MPS2025-023, was described as having been "submitted for copying and await[ing] completion by MPS Digital Exploitation Unit," and accordingly was marked on the schedule as "Not Yet Disclosed" with a note that the "Exhibit will be provided in due course." ECF 10948-3 at 3.

At today's date, June 27, 2025, the MPS provided to Plaintiffs the material so identified in the outstanding line item in digital form by means of one 64GB USB flash drive labelled "MPS 2025-068, Exhibit NES/4." An updated record of the production has been provided via a "Schedule of Relevant Material 2025 – Annex 1." *See* Simpson Decl. and its exhibits.

Pursuant to the terms of the Hague Convention Request, the MPS material so received has today been filed under seal, per the MDL Protective Order, ECF 1900, with the U.S. District Court for the Southern District of New York. The filing consists of one (1) 64GB USB flash drive that is an exact copy of the flash drive the MPS produced. Plaintiffs will provide defense counsel with exact copies of the material on the flash drive as quickly as possible. Plaintiffs will also provide a courtesy copy to the Department of Justice.

Respectfully Submitted,

KREINDLER & KREINDLER LLP

/s/ J. Gavin Simpson, Esq.

James Gavin Simpson, Esq
485 Lexington Avenue, 28th Floor
New York, NY 10017

cc: Assistant U. S. Attorneys Jennifer Jude and Jean-David Barnea (via Overnight Mail)
All counsel of record (via ECF/CM)